

Exhibit 8

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

ELIZABETH PANZARELLA :
& JOSHUA PANZARELLA, :
INDIVIDUALLY & ON BEHALF
OF ALL OTHERS SIMILARLY:

SITUATED :

Plaintiffs :

vs. :

NAVIENT SOLUTIONS, LLC : CASE NO.

Defendant : 2:18-CV-03735-PBT

Oral testimony of ELIZABETH
PANZARELLA, taken at Greenberg Traurig, LLP,
1717 Arch Street, Philadelphia, Pennsylvania,
commencing at 9:40 a.m., before Janice L.
Welsh, Court Reporter and Notary Public; in
and for the Commonwealth of Pennsylvania,
Friday, September 27, 2019.

JOB No. 3563165

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 Representing the Plaintiffs</p> <p>4</p> <p>5 LAW OFFICES OF ROBERT P. COCCO</p> <p>6 BY: ROBERT P. COCCO, ESQUIRE</p> <p>7 1500 Walnut Street Suite 900</p> <p>8 Philadelphia, Pennsylvania 19102</p> <p>9 Phone: (215) 351-0200</p> <p>10 rcocco@rcn.com</p> <p>11</p> <p>12</p> <p>13 Representing the Defendant</p> <p>14</p> <p>15 GREENBERG TRAURIG</p> <p>16 BY: LISA SIMONETTI, ESQUIRE</p> <p>17 1840 Century Park East</p> <p>18 Suite 1900</p> <p>19 Los Angeles, California 90067</p> <p>20 Phone: (310) 586-7824</p> <p>21 simonettl@gtlaw.com</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 2</p>	<p>1 ---</p> <p>2 ELIZABETH PANZARELLA, after</p> <p>3 having been first duly sworn, was</p> <p>4 examined and testified as follows:</p> <p>5 ---</p> <p>6 THE REPORTER: Usual</p> <p>7 stipulations?</p> <p>8 MR. COCCO: I don't think we need</p> <p>9 to read and sign. We're fine with that.</p> <p>10 ---</p> <p>11 (It is hereby stipulated and</p> <p>12 agreed by and between counsel for respective</p> <p>13 parties that reading, signing, sealing,</p> <p>14 certification and filing are waived and that</p> <p>15 all objections, except as to the form of</p> <p>16 questions, be reserved until the time of</p> <p>17 trial.)</p> <p>18 ---</p> <p>19 EXAMINATION</p> <p>20 ---</p> <p>21 BY MS. SIMONETTI:</p> <p>22 Q We had an opportunity to meet just a</p> <p>23 moment ago briefly, but my name is Lisa</p> <p>24 Simonetti, counsel for defendant. Can you</p> <p>25 state your full name for the record, please?</p> <p style="text-align: right;">Page 4</p>
<p>1 INDEX</p> <p>2 ---</p> <p>3 Testimony of: Elizabeth Panzarella</p> <p>4 By Ms. Simonetti 4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 EXHIBITS</p> <p>10 ---</p> <p>11</p> <p>12 NUMBER DESCRIPTION PAGE MARKED</p> <p>13 (None Marked)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 3</p>	<p>1 A Elizabeth Marie Panzarella.</p> <p>2 Q Have you ever gone by any other name?</p> <p>3 A Liz.</p> <p>4 Q Do you have a maiden name?</p> <p>5 A Yes. It was Smith.</p> <p>6 Q Have you ever had your deposition taken</p> <p>7 before?</p> <p>8 A Years and years ago.</p> <p>9 Q How many years ago?</p> <p>10 A 25.</p> <p>11 Q In what type of matter?</p> <p>12 A I worked for Shop Rite and there was --</p> <p>13 I was the front end manager, and there was a</p> <p>14 child eating candy, and they arrested the</p> <p>15 mother, and I just had to be there to tell</p> <p>16 what I saw.</p> <p>17 Q Was that like a shoplifting case?</p> <p>18 A Yes.</p> <p>19 Q Since it has been a while I'll go over</p> <p>20 the basic ground rules with you. The court</p> <p>21 reporter is taking down everything that you</p> <p>22 say verbatim. Do you understand that?</p> <p>23 A Yes.</p> <p>24 Q In order to allow her to make a clean</p> <p>25 transcript, can you wait until I complete a</p> <p style="text-align: right;">Page 5</p>

ELIZABETH PANZARELLA

<p>1 Q Has Matthew ever told you at any point 2 in time that he did list you as a reference on 3 his student loan? 4 A Unfortunately, no. Matthew has a habit 5 of not telling me things. 6 Q Has Matthew listed you as a reference on 7 any other credit obligation? 8 A Not that I'm aware of. 9 Q But he could have? 10 A He may have. 11 Q You told me earlier what your basic 12 understanding of a class action is. Do you 13 remember that? 14 A Yes. 15 Q What is your understanding of the claims 16 that you're asserting for other people? 17 A That we're being called by a company 18 that we really have nothing to do with the 19 amount or the issue. 20 Q Is there anything else about the phone 21 calls that you would complain about? 22 A Yes. Just that they're very annoying, 23 distracting, and embarrassing if you turn your 24 phone on and people are there and you're 25 listening to your messages.</p> <p style="text-align: right;">Page 42</p>	<p>1 Q What is a skip trace process? 2 A I have no idea. 3 Q Have you ever heard of a system that's 4 called a mobile dialing system? 5 A No. 6 Q Did you pay any more for your cell phone 7 service than you would have otherwise, based 8 on the telephone calls from Navient? 9 A I guess I could answer that in two ways, 10 but no. 11 Q What is the other way to answer it? 12 A I'm just saying there was a period of 13 time when I had Matthew on my bill, and they 14 were calling him too, I guess. His phone bill 15 was always -- that's why I cut his phone off. 16 Q For what period of time was he on your 17 plan? 18 A Since he was 15 up until I want to say 19 two or three years ago. 20 Q Until he was around 29 to 30? 21 A It may be. He was furious with me 22 because I kept saying he had to pay his 23 portion, and he was ignoring me. So, I told 24 him I was going to shut his phone off if he 25 didn't start paying for it because his bill</p> <p style="text-align: right;">Page 44</p>
<p>1 Q Do you know anything about the manner in 2 which Navient Solutions made the telephone 3 calls through its systems? 4 A No. I don't. 5 Q Have you ever heard of the term auto 6 dial? 7 A No. 8 Q How about automatic telephone dialing 9 system? 10 A I'm not sure. Is that when a company 11 keeps repeatedly calling? 12 Q I'm asking you. 13 A That's the only thing I believe it to 14 be. 15 Q So, you don't have any understanding 16 beyond that? 17 A No. I just believe it to be a system 18 that automatically keeps calling you until 19 it's resolved. 20 Q So, in the complaint if you allege that 21 Navient initiated auto dial calls to you 22 multiple times on your cell phone, as stated 23 in paragraph 23, you mean that calls were made 24 repeatedly to you? 25 A Yes.</p> <p style="text-align: right;">Page 43</p>	<p>1 was -- he used a lot of cellular data. So, 2 there were months his bill alone would be over 3 \$100.00, and he wasn't paying it, and I was 4 responsible. 5 Q Did he have the same cell number through 6 this time period? 7 A Yes. He doesn't now. 8 Q What was it? 9 A 484 -- it's been a while. 10 Q Let me see if I can find it. Was it 11 484-638-0910? 12 A That may be it. I know my other two 13 boys' numbers start with 850, and I know my 14 son David's number is 850-2136, and he has 15 received calls too from Navient. 16 Q Do you recognize the cell number 17 610-505-0265? 18 A That was Matt. 19 Q Do you recognize this 484-638-0910 20 number at all? 21 A No. That may be one of his new numbers, 22 but I'm not sure. 23 Q So, you mentioned that at least one of 24 your other sons was receiving calls related to 25 Matthew's loans?</p> <p style="text-align: right;">Page 45</p>

ELIZABETH PANZARELLA

<p>1 A No.</p> <p>2 Q You have never heard of that?</p> <p>3 A No.</p> <p>4 Q What is your understanding of your</p> <p>5 responsibility in this case as a proposed</p> <p>6 class representative?</p> <p>7 A Just to state the facts for how annoying</p> <p>8 these phone calls are, and they should not be</p> <p>9 made to people that are not involved -- have</p> <p>10 anything to do with money being owed.</p> <p>11 Q Do you know whether Navient Solutions</p> <p>12 might have any obligation on federal loans to</p> <p>13 attempt to locate borrowers that are</p> <p>14 delinquent?</p> <p>15 A No.</p> <p>16 Q Do you have any understanding of --</p> <p>17 strike that.</p> <p>18 So, aside from representing</p> <p>19 other people who think the calls are annoying,</p> <p>20 is there anything else that you think you have</p> <p>21 a duty to undertake with respect to other</p> <p>22 people?</p> <p>23 A Yes. Just that it's an invasion of</p> <p>24 privacy for one thing, and it's inconvenient,</p> <p>25 it's annoying, it's stressful when your phone</p> <p style="text-align: right;">Page 50</p>	<p>1 your cell phone and keep harassing you.</p> <p>2 That's about it.</p> <p>3 Q Have you ever heard of the Fair Debt</p> <p>4 Collection Practices Act?</p> <p>5 A Yes.</p> <p>6 Q Again, aside from anything Mr. Cocco has</p> <p>7 told you, what is your understanding of what</p> <p>8 that provides?</p> <p>9 A Just what Mr. Cocco told me.</p> <p>10 Q So, you haven't done any research into</p> <p>11 the Fair Debt Collection Practices Act?</p> <p>12 A No.</p> <p>13 Q And not the TCPA either?</p> <p>14 A No. I can't say I'm really -- aside</p> <p>15 from playing my games --</p> <p>16 Q You're not a researcher?</p> <p>17 A No. I'm too busy with my</p> <p>18 grandchildren.</p> <p>19 Q So, can you explain to me why you</p> <p>20 believe you're a suitable class representative</p> <p>21 in the case?</p> <p>22 A Well, I like the law -- I mean, like I</p> <p>23 said, I would like it to stop, harassing</p> <p>24 people that don't really have anything to do</p> <p>25 with the loan or debt that they're trying to</p> <p style="text-align: right;">Page 52</p>
<p>1 keeps ringing and you're somewhere that you</p> <p>2 have to shut your phone off. I just don't</p> <p>3 think it's right.</p> <p>4 Q Do you understand that there are two</p> <p>5 claims asserted in the amended complaint?</p> <p>6 A The phone calls?</p> <p>7 Q No. What is your understanding of what</p> <p>8 the complaint is seeking against Navient</p> <p>9 Solutions?</p> <p>10 A I guess just a solution to them to stop</p> <p>11 calling.</p> <p>12 Q Anything else?</p> <p>13 A Whatever the Court feels.</p> <p>14 Q Do you have any understanding of what</p> <p>15 the claims are in the amended complaint?</p> <p>16 A About them calling people without their</p> <p>17 permission that have nothing to do with the</p> <p>18 loan.</p> <p>19 Q Have you ever heard of the Telephone</p> <p>20 Consumer Protection Act?</p> <p>21 A Yes. I have.</p> <p>22 Q Aside from anything your lawyer has told</p> <p>23 you about that, and we can call it TCPA, what</p> <p>24 is your understanding of what it provides?</p> <p>25 A That collectors are not allowed to call</p> <p style="text-align: right;">Page 51</p>	<p>1 collect. I just would like it to stop.</p> <p>2 Q Have you spoken with any other person</p> <p>3 who is receiving calls from --</p> <p>4 A No. I haven't.</p> <p>5 MR. COCCO: You have to let her</p> <p>6 finish.</p> <p>7 THE WITNESS: I'm sorry.</p> <p>8 MR. COCCO: That's all right.</p> <p>9 BY MS. SIMONETTI:</p> <p>10 Q Have you spoken with anyone else who has</p> <p>11 received calls from Navient, aside from the</p> <p>12 family members that you have identified?</p> <p>13 A No. I haven't.</p> <p>14 Q So, as you sit here today, do you know</p> <p>15 whether any other person is annoyed by</p> <p>16 receiving these types of telephone calls?</p> <p>17 A No. I don't.</p> <p>18 Q Is there any reason that your other</p> <p>19 family members have not joined you and your</p> <p>20 son as plaintiffs in this case?</p> <p>21 A I didn't ask them.</p> <p>22 Q Were they annoyed by the telephone</p> <p>23 calls?</p> <p>24 A Yes. They were.</p> <p>25 Q But you did not ask them to join in the</p> <p style="text-align: right;">Page 53</p>

1 CERTIFICATE
2 ---
3 I, Janice L. Welsh, a Notary
4 Public, do hereby certify that the foregoing
5 deposition of Elizabeth Panzarella, was taken
6 before me, pursuant to notice, at the time and
7 place indicated; that said deponent was by me
8 duly sworn to tell the truth, the whole truth,
9 and nothing but the truth; that the testimony
10 of said deponent was correctly recorded in
11 machine shorthand by me and thereafter
12 transcribed under my supervision and
13 computer-aided transcription; that the
14 deposition is true and that I am neither of
15 counsel nor kin to any party in said action,
16 nor interested in the outcome thereof.
17 Witness my hand and official
18 seal this 15th day of October, 2019.
19
20
21
22 
23 JANICE L. WELSH
24 Notary Public
25

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1 ACKNOWLEDGMENT OF DEPONENT

2 I, _____, do hereby

3 certify that I have read the foregoing pages

4 ____ to ____ and that the same is a correct

5 transcription of the answers given by me to

6 the questions herein propounded, except for

7 the corrections or changes in form or

8 substance, if any, noted in the attached

9 Errata Sheet.

10

11 _____

12 DATE SIGNATURE

13

14

15 Subscribed and sworn to before me this _____

16 day of _____, 2019.

17

18 My commission expires: -----

19

20

21 _____

22 Notary Public

23

24

25

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VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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